

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

JILL HINES ET AL	*	
	*	CASE NO. 3:23-CV-571
	*	
VERSUS	*	CHIEF JUDGE TERRY A. DOUGHTY
	*	
ALEX STAMOS ET AL	*	MAG. JUDGE KAYLA D. MCCLUSKY
	*	

UNOPPOSED MOTION FOR SECOND EXTENSION OF TIME
TO FILE RESPONSIVE PLEADINGS

NOW INTO COURT, through undersigned counsel, come Defendants Alex Stamos, Renée DiResta, the Board of Trustees of the Leland Stanford Junior University, the Leland Stanford Junior University, Kate Starbird, Graphika, Atlantic Council, and Graham Brookie (“Defendants”), who respectfully move for a second extension of time—until August 14, 2023—to respond to the Complaint (ECF 1) filed by Plaintiffs Jill Hines and Jim Hoft (“Plaintiffs”).¹ In support, Defendants represent as follows:

1. Plaintiffs filed the Complaint on May 2, 2023, and served Defendants with copies of the Summons and Complaint between May 10 and May 15, 2023. *See* ECF 32.

¹ The Complaint names Camille François as a defendant, but she has not been served with the Complaint and Summons.

Plaintiffs also purported to name the Stanford Internet Observatory and the Atlantic Council's Digital Forensic Research Lab as defendants. The Stanford Internet Observatory is a Stanford program, not an independent legal entity that can sue or be sued, and it has not been properly served and is not a proper defendant. Likewise, the Digital Forensic Research Lab is an Atlantic Council program, not an independent legal entity that can sue or be sued, and it has not been properly served and is not a proper defendant. Defendants Leland Stanford Junior University and Atlantic Council are in the process of meeting and conferring with Plaintiffs as to this issue and will address it in an appropriate motion if necessary after completing the meet-and-confer process. To the extent a response to the complaint is due from Stanford Internet Observatory or the Digital Forensic Research Lab, the deadline should be August 14, 2023, as well.

2. On May 31, 2023, this Court granted Defendants' first request for an extension of time to respond to the Complaint, to July 14, 2023. ECF 33.

3. Since then, Defendants have been diligently preparing their response to the Complaint. However, the Complaint presents numerous questions of federal, state, and constitutional law and involves four sets of separately represented Defendants. Notwithstanding Defendants' diligent efforts, Defendants require an additional 30-day extension of time—until August 14, 2023—to coordinate their response to the Complaint.

4. Defendants make this request in good faith and not for the purpose of undue delay.

5. Counsel for Defendants have conferred with counsel for Plaintiffs, and Plaintiffs consent to the requested extension of time for Defendants to respond to the Complaint, to August 14, 2023.²

WHEREFORE, Defendants request that the Court grant this motion and enter an order extending the deadline for Defendants to respond to the Complaint to August 14, 2023.

² Pursuant to Western District of Louisiana Local Rule 7.9, attached to this motion is a certificate by undersigned counsel that consent was sought for the extension requested herein and there is no opposition to the extension sought by this motion.

June 27, 2023

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*Counsel for Kate Starbird, in her official and
individual capacities*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 27th day of June, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and I further certify that, on the same day, I mailed, faxed, or e-mailed the foregoing document with exhibits and notice of electronic filing to the attorneys for all parties.

/s/ Devin C. Reid

Devin C. Reid